

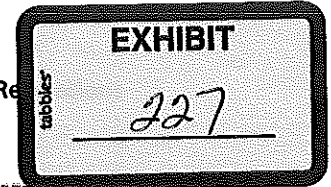
Connecticut Association of Golf Course Superintendents, Inc.

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Department of Environmental Protection: Proposed Stream Flow Standards and Regulations
Public Noticed in the Connecticut Law Journal on October 13, 2009



January 27, 2010

Paul E. Stacey
Department of Environmental Protection
Bureau of Water Protection and Land Reuse
Planning & Standards Division
79 Elm Street
Hartford, CT 06106-5127

BUREAU OF WATER PROTECTION AND LAND REUSE
BUREAU CHIEF
OFFICE OF THE BUREAU CHIEF

FEB 04 2010
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Dear Mr. Stacey,

My name is John Garcia, I'm the President of the Connecticut Association of Golf Course Superintendents. CAGCS represents superintendents at the nearly 200 golf courses throughout the state. Like most of my colleagues I was attracted to my profession due to my love of the outdoors, and my respect for the environment. We believe that the current Proposed Stream Flow Standards and Regulations are well intentioned, and agree that there are a small number of water bodies in the state in dire need of reclamation and protection. However, on behalf of the golf course industry, we are concerned about the negative fiscal impact that the proposed regulations will have on struggling golf courses throughout the state. Many of our member clubs have been pushed to the brink of bankruptcy during the recent economic downturn and the increase in cost associated with this proposal will potentially cause golf courses to fail. The existing registration and permit process has cost our member clubs between \$50,000 and \$650,000 each in consulting, legal, infrastructure and permit fees. For many golf clubs in the state, the proposed regulation will create an additional financial burden that they will not be able to sustain. If golf courses close the land will likely be utilized by housing developments and industrial use which would likely have a greater negative impact on water quality (septic systems) and usage, in addition to stressing municipal services throughout the state. Golf courses serve as open green space providing natural habitat to wildlife, helping to absorb and filter rain water, improve community aesthetics, and improve the physical and mental health of some 350,000 golfers state-wide. In addition they provide nearly 10,000 jobs and \$400 million in net revenue to the state.

Collectively, golf course superintendents are proud stewards and respect the environment. We are a self-policing industry when it comes to water usage. This is due to the fact that our delivery systems are expensive to operate and maintain, and wet conditions promote decline in turf quality and playability for our customers. For these reasons, we take great care in the amount of water we use. It is in every golf course's best interest to conserve water and we have worked closely with the DEP to develop the "Best Management Practices for Golf Course Water Use." The water used on golf courses is an excellent investment in both economic and environmental terms. Irrigated golf courses generate thousands of tourists and property tax dollars for the state economy. When effectively irrigated, healthy turf grass provides numerous environmental benefits including:

- Production of oxygen (carbon dioxide exchange) which cools the atmosphere;
- Prevents soil erosion;
- Filters natural and synthetic contaminants from rainfall; and
- Recharges critical groundwater supplies.

Golf Courses actually serve as "catch basins" for rainwater and residential/industrial runoff. In fact, it is well known that an inch of rain supplies 27,000 gallons of water over an acre of land. The average golf course is set on 150 acres, and the average annual rainfall in Connecticut is 46". Therefore, the average golf course supplies nearly 2 million gallons of clean,


filtered water to groundwater and surface water supplies annually. In the driest of years, an average golf course may utilize 25 million gallons of water for irrigation purposes, so they still represent a net increase of some 1.75 million gallons to the system. Additionally important to note, is that not every gallon of water used for golf course irrigation is "lost" due to evaporation or plant uptake, much is actually immediately returned to the groundwater system. Proper irrigation practices call for deep, infrequent irrigation cycles. This is accomplished by bringing the soil profile to "field capacity", and then allowing it to dry down. As this cycle is repeated, turf grass roots dig deeper to "mine" the soil for water and nutrients. Over time, the deeper roots make for stronger plants which require less fertilizer, pesticides, and water. By putting superficial limits on daily watering allotments, we are promoting light, frequent irrigation which over time will promote poor root development and weaker plants that require more fertilizer, chemicals and water to sustain.

Additionally, as was reported at the DEP's December 21st Informational Hearing, our irrigation practices account for less than 1-percent by volume, of the registered and/or permitted water diversion in the state. It has also been reported that less than .4-percent of the State's water bodies are considered "at risk". Based on these facts, CAGCS would respectfully ask that DEP reconsider the process. We feel it would be more sensible to classify first and complete a comprehensive economic impact study in partnership with the small business stakeholders. The proposed regulations should be narrowed to focus on the .4-percent of water bodies that are "at risk" rather than attempt to apply a broad standard to bodies of water that aren't in any danger.

CAGCS would like to specifically ask that DEP exempt golf courses from this proposed regulation, pursuant to the updating, clarification, and implementation of the "Best Management Practices for Golf Course Water Use" by all golf courses in the state. We feel that through new technologies and best management practices, the majority of golf courses are already achieving the results the department is seeking in this regulation. Following the conclusion of the comment period, CAGCS would appreciate the opportunity to meet with the department to discuss the details of an exemption.

Thank you for the opportunity to comment, we look forward to continuing our conversation on this important matter.

Sincerely,



John Garcia, President
Connecticut Association of Golf Course
P.O. Box 3678
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CC: The Honorable M. Jodi Rell, Governor
The Honorable Amy Marrella, DEP Commissioner